

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DARNELL SMITH, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	Case No.: 1:15-cv-03467
v.)	
)	Honorable Andrea R. Wood
CITY OF CHICAGO, a municipal)	Magistrate Judge Heather K. McShain
corporation, <i>et al.</i> ,)	
)	
Defendants.)	

PARTIES' JOINT STATUS REPORT

Pursuant to the Court's August 10, 2022 Order (Doc. 559), the parties submit the following joint status report:

The parties have exchanged additional and updated versions of a proposed settlement agreement, exhibits and records relating to the final resolution of this matter. The parties have made significant headway and are moving closer to finalizing the comprehensive written settlement agreement and related pleadings. However, the process is taking longer than previously expected due to the scope and complexity of drafting the settlement documents, which reflect that the resolution of this this case will, in part, be through the proposed inclusion of certain remedies into the Consent Decree pending before Judge Dow. Further, additional time will be needed for stakeholders to provide final review and comment.

The parties have and continue to remain on the same page and at this time and do not require the assistance of the Court. The parties endeavored to provide firm deadlines on finalizing the proposed settlement agreement and submitting a motion for Court approval, but are not at a position to do so at this time. The parties respectfully request that the Court continue to stay discovery and allow the parties to file an additional status report on October 13, 2022 where the parties expect to be able to propose dates to proceed with the resolution of the matter.

The parties appreciate and share the urgency to effectuate finality. If the Court does have concerns with the parties' progress, the parties can provide more updates and explanations at an *in camera* status hearing at the Court's convenience.

Dated: September 14, 2022

Respectfully submitted,

By: /s/ Jack Prior
One of the Attorneys for Plaintiffs
and the Class

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By: /s/ Michael Sheehan
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